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Attorneys for Defendants ATIEVA USA, INC.
SEVERANCE BENEFIT PLAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DOUGLAS COATES,

Plaintiff,

v.

ATIEVA USA, INC. SEVERANCE
BENEFIT PLAN,

Defendant.

CASE NO. 3:20-CV-04176-SK

**DECLARATION OF J. ROBERT
SHUMAN, JR. IN SUPPORT OF
STIPULATED PROTECTIVE ORDER**

I, J. ROBERT SHUMAN, JR., declare:

1. I am an attorney licensed by the Bar of the State of California, and am admitted to practice before this Court.

2. I am a partner at the law firm of Shuman Snyder LLP, counsel of record for Defendant ATIEVA USA, INC. SEVERANCE BENEFIT PLAN and am one of the attorneys responsible for the defense of this action. I have personal knowledge of the facts contained herein, and if called as a witness, I could and would testify competently thereto.

3. The Stipulated Protective Order filed herewith is identical to the model stipulated protective order for standard litigation as provided by the Court, except for the addition of case

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1 identifying information.

2 I declare under penalty of perjury under the laws of the State of California that the
3 foregoing is true and correct, and that I executed this declaration on September 30, 2020, at
4 Menlo Park, California.

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6 /S/
J. ROBERT SHUMAN, JR.